

JAP:RCH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15 U 725

-----X

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

CAROLINA CARO CANO,

Defendant.

-----X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER CHEN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about August 4, 2015, within the Eastern District of New York and elsewhere, the defendant CAROLINA CARO CANO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:¹

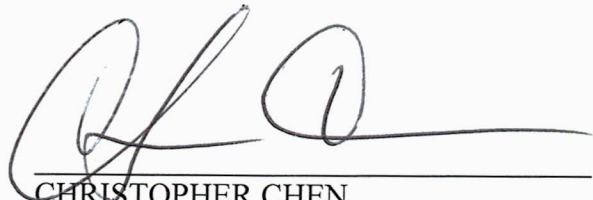
1. On or about August 4, 2015, the defendant CAROLINA CARO CANO arrived at John F. Kennedy International Airport in Queens, New York, aboard Avianca Airlines flight no. 670 from the Republic of El Salvador.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. On or about August 4, 2015, the defendant CAROLINA CARO CANO was selected for a routine examination by United States Customs and Border Protection (“CBP”). While answering standard CBP examination questions, the defendant claimed ownership of a red and black “Primo” suitcase bearing bag tag #134 AV 044590 and its contents. The defendant was also in possession of the bag tag receipt corresponding to the red and black “Primo” suitcase. During the examination, CBP officers opened the red and black “Primo” suitcase, inside of which was a black and grey “Wilson” duffel bag and a black and yellow “Wilson” duffel bag. CBP officers observed that the bottom of the black and grey “Wilson” appeared unusually thick. The bottom of the black and grey “Wilson” duffel bag was probed and revealed a tan powdery substance. CBP officers also probed the bottom of the black and yellow “Wilson” duffel bag, which also revealed a tan powdery substance. A CBP officer field-tested the substance, which tested positive for the presence of heroin. The total gross weight of the heroin recovered is approximately 1.4 kilograms.


WHEREFORE, your deponent respectfully requests that the defendant
CAROLINA CARO CANO be dealt with according to law.

Dated: Brooklyn, New York
August 4, 2015

A handwritten signature in dark ink, appearing to read 'Christopher Chen', written over a horizontal line.

CHRISTOPHER CHEN
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
4th day of August, 2015

A yellowed, rectangular stamp or signature area, possibly containing a signature, located above the text of the magistrate judge.

THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK